

**REMARKS**

Claims 1-7 and 19-26 are pending in this application. Claims 1-7 stand rejected. By this Amendment, claim 1 has been amended and new claims 19-26 have been added. No new matter has been added. The amendments made to the claims do not alter the scope of these claims, nor have these amendments been made to define over the prior art. Rather, the amendments to the claims have been made to improve the form thereof. In light of the amendments and remarks set forth below, Applicants respectfully submit that each of the pending claims is in immediate condition for allowance.

Paragraph 4 of the Office Action states that the information disclosure statement filed March 16, 2005 fails to comply with 37 C.F.R. § 1.98(a)(3) because it does not include a concise explanation of the relevance, as it is presently understood by the individual designated under 37 C.F.R. § 1.56. Applicants note that there was no IDS filed March 16, 2005, only a response to election of species requirement. The only IDS filed in this case was filed with the application. The references on that IDS are discussed in the specification. As such, Applicants respectfully request that the information contained in the IDS be considered.

Claims 1, 2, 5, and 7 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,518,165 ("Yoon"). Applicant respectfully traverses this rejection.

To anticipate a claim under 35 U.S.C. § 102, the cited reference must disclose every element of the claim, as arranged in the claim, and in sufficient detail to enable one skilled in the art to make and use the anticipated subject matter. See, PPG Industries, Inc. v. Guardian Industries Corp., 75 F.3d 1558, 1566 (Fed. Cir. 1996); C.R. Bard, Inc. v. M3 Sys., Inc., 157 F.3d 1340, 1349 (Fed. Cir. 1998). A reference that does not expressly disclose all of the elements of a claimed invention cannot anticipate

unless all of the undisclosed elements are inherently present in the reference. See, Continental Can Co. USA v. Monsanto Co., 942 F.2d 1264, 1268 (Fed. Cir. 1991).

Claim 1 recites forming a conductive layer over the entire surface of the insulating layer while filling the through hole and selectively removing said conductive layer to simultaneously form a connecting conductor filling said through hole and wiring extending over said insulating layer.

In contrast, in Yoon, a through hole is created in a sacrificial metal layer as well as channels on top of the sacrificial metal layer using photo-resist. A copper layer is grown on the top surface of the sacrificial metal layer in the channels to form a conductor as well as filling the through hole forming a connector. Yoon does not utilize an insulating layer, but instead grows conductors on a sacrificial metal layer. A metal layer cannot be an insulating layer. As such, Yoon does not disclose “forming a conductive layer over the entire surface of said insulating layer” or “selectively removing said conductive layer” as explicitly recited in pending claim 1. Similarly, claims 19 and 23 include forming a wiring layer elongated over said insulating layer. In Yoon, the wiring layer is formed on a sacrificial metal layer, not an insulating layer.

Claim 1 stands rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Publication No. 2005/0020046 (“Brenner”). Applicant respectfully traverses this rejection. Among the limitations of independent claim 1 not present in the cited reference is forming a conductive layer of the entire surface of said insulating layer while filling said through hole and selectively removing said conductive layer to simultaneously form a connecting conductor filling said through hole and a wiring standing over said insulating layer from said connecting conductor.

Claim 1 recites the step of forming a conductive layer over the entire surface of said insulating layer while filling said through hole, and selectively removing said

conductive layer to simultaneously form a connecting conductor filling said through hole and a wiring extending over said insulating layer from said connecting conductor.

In contrast, Brenner does not disclose the simultaneous formation of a conductive layer and through hole filling. In Brenner, a connecting conductor 51 is formed separately from the wiring 61. As such, Brenner fails to disclose Applicants' explicitly recited claim limitations.

Claim 19 is allowable over the cited references as well. Claim 19 explicitly recites peeling a support member away from a semiconductor chip.

Claim 23 recites the step of forming a built-up multilayer substrate directly on an insulating layer to electrically connect an interconnect in said built-up multilayer substrate to a wiring layer. Malladi, however, does neither teach nor suggest this forming a built-up multilayer substrate step.

Therefore, claim 19 and 23 can not be derived from the combination of Brenner and Malladi.

Applicant has responded to all of the rejections and objections recited in the Office Action. Reconsideration and a Notice of Allowance for all of the pending claims are therefore respectfully requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue.

Application No.: 10/771,451

Docket No.: N0029.1650

If the Examiner believes an interview would be of assistance, the Examiner is welcome to contact the undersigned at the number listed below.

Dated: October 4, 2005

Respectfully submitted,

By

Ian R. Blum

Registration No.: 42,336

DICKSTEIN SHAPIRO MORIN & OSHINSKY  
LLP

1177 Avenue of the Americas  
New York, New York 10036-2714  
(212) 835-1400  
Attorney for Applicants

IRB/mgs